



possess with the intent to distribute more than 40 grams of a mixture and substance containing a detectable heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 3

(Possession with Intent to Distribute a Controlled Substance, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

3. On or about September 28, 2023, in the Northern District of Ohio, Eastern Division, Defendant RONMEL DEMETRIOUS THOMAS, did knowingly and intentionally possess with intent to distribute approximately 17.32 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1, 2 and 3 are incorporated herein by reference. As a result of the foregoing offenses, defendant RONMEL DEMETRIOUS THOMAS shall forfeit to the United States any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations; any and all of the property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.